

Alexander F. Giovanniello (CSB # 125562)
Joseph M. Lorant (CSB# 327731)
GIOVANNIELLO LAW GROUP
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Attorneys for Defendant:
DESERT VALLEY HOSPITAL, LLC
dba DESERT VALLEY HOSPITAL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

COLLEEN MANGHANE; and
ROBERT MANGHANE,

Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO;
SHANNON D. DICUS; DESERT
VALLEY HOSPITAL; and DOES 1-
15, inclusive.

Defendants.

) Case No.: 5:25-cv-01107 JGB (DTBx)

)
) Related Case No.: 5:25-cv-00140-
) WLH-SHK

)
) STIPULATION TO EXTEND TIME
) TO RESPOND TO INITIAL
) COMPLAINT BY NOT MORE THAN
) 30 DAYS

)
) JUDGE: Jesus G. Bernal

)
) Complaint filed May 29, 2025

)
) Trial scheduled: None

Plaintiffs AARON JAMES (hereinafter referred to as “Decedent”), by and
through his successors-in-interest, Colleen Manghane and Robert Manghane;
COLLEEN MANGHANE; and ROBERT MANGHANE (hereinafter collectively

1 referred to as “the Manghane Plaintiffs”); Defendants COUNTY OF SAN
2 BERNARDINO and SHERIFF SHANNON D. DICUS (hereinafter collectively
3 referred to as “the County Defendants”); and Defendant DESERT VALLEY
4 HOSPITAL, LLC dba DESERT VALLEY HOSPITAL (hereinafter referred to as
5 “Desert Valley Hospital”), through their respective counsel of record, voluntarily
6 and with full knowledge and understanding of the provisions stated herein, agree
7 to the following:

8 WHEREAS, the Manghane Plaintiffs filed their Complaint on May 29,
9 2025, upon the County Defendants and Desert Valley Hospital;

10 WHEREAS, also on May 29, 2025, Plaintiffs AARON JAMES, by and
11 through his successors-in-interest, Arthur James and Stacey M. Abbot; ARTHUR
12 JAMES; and STACEY M. ABBOT (hereinafter collectively referred to as “the
13 James Plaintiffs”) filed their Second Amended Complaint in their related action,
14 styled as ARTHUR JAMES, and STACEY M. ABBOT as parents of, and
15 successors in interest to, AARON JAMES, decedent; Plaintiffs, vs. COUNTY OF
16 SAN BERNARDINO, a municipal entity; Sheriff SHANNON D. DICUS, in his
17 individual, and official capacities; DESERT VALLEY HOSPITAL, LLC, a
18 Delaware Limited Liability Company; DOES 1-20, inclusive. Defendants., Case
19 No. 5:25-cv-00140-WLH-SHK; and

20 WHEREAS, as part of the meet and confer discussions regarding
21 responsive pleading and/or motions to dismiss, the Manghane Plaintiffs’, the
22 County Defendants, and Desert Valley Hospital discussed and proposed the
23 consolidation of these related cases;

1 WHEREAS, the James Plaintiffs have yet to confirm or deny their
2 willingness to consolidate these related cases;

3 WHEREAS, the County Defendants and Desert Valley Hospital must file
4 and serve their responses to the Manghane Plaintiffs' Complaint by June 19, 2025;
5 and

6 WHEREAS, thirty days after June 19, 2025, lands on Saturday, July 19,
7 2025.

8 WHEREFORE, THE PARTIES THEREFORE STIPULATE TO THE
9 FOLLOWING:

10 1. The County Defendants and Desert Valley Hospital will receive a
11 thirty-day extension by which to file and serve their respective responsive
12 pleading to the Manghane Plaintiffs' Complaint, moving the due date from June
13 19, 2025, to Monday July 21, 2025, as allowed pursuant to Local Rule 8-3 of the
14 United States District Court for the Central District of California.

15
16 **IT IS SO STIPULATED.**

17 Dated: June 19, 2025

LAW OFFICES OF DALE K. GALIPO

18
19 By: /s/ Marcel F. Sincich
20 Dale K. Galipo
21 Marcel F. Sincich
22 Attorneys for Plaintiffs
23 AARON JAMES, by and through his
successors-in-interest, Colleen Manghane
and Robert Manghane; COLLEEN
MANGHANE; and ROBERT
MANGHANE

1 Dated: June 19, 2025

GIOVANNIELLO LAW GROUP

2
3 By:



Alexander F. Giovanniello

Joseph M. Lorant

Attorneys for Defendant

DESERT VALLEY HOSPITAL, LLC dba

DESERT VALLEY HOSPITAL

4
5
6
7
8 Dated: June 19, 2025

LYNBERG AND WATKINS

9
10 By:

/e/ Shannon Gustafson

Edward Southcott, Jr.

Shannon Gustafson

Attorneys for Defendants

COUNTY OF SAN BERNARDINO and

SHERIFF SHANNON D. DICUS



Outlook

Re: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

From Marcel Sincich <msincich@galipolaw.com>

Date Thu 6/19/2025 2:23 PM

To Joseph M. Lorant <jml@giolawgroup.com>; Shannon Gustafson <sgustafson@lynberg.com>

Cc Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence <gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Alejandro Monguia <amonguia@galipolaw.com>; Kristy K. Shimotani <kks@giolawgroup.com>; Stefany Anderson <sanderson@galipolaw.com>

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Hi Joseph,

Thank you for putting this together. You have my permission to file with my e-signature.

To reiterate as we discussed, I think it makes the most sense to get this extension in so that we can potentially consolidate the cases (get in the right court), then figure out the right parties and then any issues with the claims substantively.

I look forward to speaking with you all soon. Thanks.

Very Respectfully,

Marcel F. Sincich, Esq.

Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: msincich@galipolaw.com

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From: Joseph M. Lorant <jml@giolawgroup.com>

Sent: Thursday, June 19, 2025 14:04

To: Marcel Sincich <msincich@galipolaw.com>; Shannon Gustafson <sgustafson@lynberg.com>

Cc: Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence <gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Kristy K. Shimotani <kks@giolawgroup.com>

Subject: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

Counsels:

After discussing yesterday with Plaintiffs' counsel for this case, attached please find the proposed stipulation and separate order to continue the defendants' responsive pleadings in this case by thirty days so that there may be time to consider consolidation of cases.

Best regards,

Joseph M. Lorant



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jml@giolawgroup.com

Nevada Office

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Outlook

RE: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

From Shannon Gustafson <sgustafson@lynberg.com>

Date Thu 6/19/2025 2:23 PM

To Joseph M. Lorant <jml@giolawgroup.com>; Email: <msincich@galipolaw.com>

Cc Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence <gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Kristy K. Shimotani <kks@giolawgroup.com>

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You have my permission to sign and file.

Thanks

Shannon L. Gustafson

Shareholder

Direct: (714) 352-3547



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From: Joseph M. Lorant <jml@giolawgroup.com>

Sent: Thursday, June 19, 2025 2:05 PM

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Cc: Email: <dalekgalipo@yahoo.com>; Edward Southcott <esouthcott@lynberg.com>; Gloria Pence <gpence@lynberg.com>; Karla Fonseca <kfonseca@lynberg.com>; Kristy K. Shimotani <kks@giolawgroup.com>

Subject: Maghange v. County San Bernardino, et al. | Stipulation to continue responsive pleading

Importance: High

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Counsels:

After discussing yesterday with Plaintiffs' counsel for this case, attached please find the proposed stipulation and separate order to continue the defendants' responsive pleadings in this case by thirty days so that there may be time to consider consolidation of cases.

Best regards,

Joseph M. Lorant



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PROOF OF SERVICE

I am employed in the county of Orange, State of California. I am over the age of eighteen and not a party to the within entitled action; my business address is Six Pointe Drive, Suite 520 Brea, California 92821.

On **June 19, 2025**, I served the foregoing document(s) described as, **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS** as follows:

See below service list

() BY U.S. MAIL: I am “readily familiar” with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice the envelope was sealed and placed for collection and mailing with the United States Postal Service on that same day with postage thereon fully prepaid at Brea, California following ordinary business practices.

() BY FEDERAL EXPRESS OVERNIGHT: I placed said envelope(s) for collection and overnight delivery at a regularly utilized drop box of the overnight delivery carrier.

(XX) BY ELECTRONIC SERVICE: I caused the document(s) to be sent from kks@giolawgroup.com to the person(s) at the electronic notification addresses indicated on the service list.

Executed on **June 19, 2025**, at Brea, California.

(XX) STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Kristy K. Shimotani

Kristy K. Shimotani

1 SERVICE LIST

2

3 Dale K. Galipo

Counsel for Plaintiffs

4 Marcel F. Sincich

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13 Edward Southcott, Jr.

Counsel for Defendant, County of San

14 Shannon Gustafson

Bernardino and Shannon D Dicus, Sheriff

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